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v. *Platt*, 105 Mich. 635; *Missouri Pac. R. v. Palmer*, 55 Nev. 559; *Fowler v. Fowler*, 111 Mich. 676. But it should be observed that in nearly all these cases some foundation for the opinion was put in evidence before the jury. Contra, see *Hastings v. The Uncle Sam*, 10 Cal. 341; *Harris v. Proofs Ex'rs.*, 10 Barb. 489; *Perrin v. Hotchkiss*, 58 Barb. 77; *Schuhle v. Cunningham*, 14 Daly (N. Y.) 404. According to general weight of authority the ruling in the principal case is sound; the mere fact of plaintiff rendering the service entitling her to give opinion as to their value. See 1 WIGMORE, EVID., § 715 and cases cited supporting this rule.

HUSBAND AND WIFE—WIFE'S RIGHT TO SUE FOR SEPARATE MAINTENANCE.—Defendant, a gold miner living at Valdez, Alaska, refused to support his wife, who had followed him, against his wishes, from their former home in Boston. She brought an action for separate maintenance. Defendant contended that the court had no jurisdiction. *Held*, that although not authorized by statute to entertain the suit, the court had jurisdiction by virtue of its general equity powers. *Jones v. Jones*, 3 Alaska 616.

Neither the ecclesiastical nor the equity courts of England could entertain a suit for separate maintenance and alimony, independent of a suit for divorce. *Ball v. Montgomery*, 2 Ves. 191; 1 BISHOP, MAR., DIV. AND SEP., §§ 1393-1400. Except, in rare cases, on a *supplicavit*. *Adams v. Adams*, 100 Mass. 365, 1 Am. Rep. 111. The reasons assigned are (1) that these courts were never given, and never had the right to assume, jurisdiction of such cases, and (2) that the right to buy necessities on the husband's credit is adequate. *Adams v. Adams*, *supra*. The majority of American courts have adopted the doctrine. It is the rule in New York, Massachusetts, Arkansas, Connecticut, Florida, Georgia, Illinois, Indiana, Louisiana, Michigan, Missouri, New Hampshire, New Jersey, Oregon, Pennsylvania, Texas, Vermont, West Virginia and Wisconsin. Almost without exception, however, in these states statutes have been passed giving a remedy to abandoned wives similar in effect to that sought in the principal case. On the other hand, the courts of many states have assumed jurisdiction of such cases on the theory that there is no adequate legal remedy, saying that the right to buy necessities on the husband's credit carries with it no certainty that his credit will be honored, and that in any event to require each tradesman to sue the husband for his bill is bad policy; arguing also that an injured spouse whom conscience or religion deters from seeking divorce would otherwise be remediless. *Clisby v. Clisby*, 160 Ala. 572, 49 South. 445; *Kimble v. Kimble*, 17 Wash. 75, 49 Pac. 216; *Brewer v. Brewer*, 79 Neb. 726, 113 N. W. 161, 13 L. R. A. (N. S.) 222; *Cureton v. Cureton*, 117 Tenn. 103, 96 S. W. 608. This rule obtains in Alabama, California, Colorado, District of Columbia, Iowa, Kentucky, Maryland, Mississippi, Montana, Nebraska, North Carolina, Ohio, South Carolina, South Dakota, Tennessee, Virginia, and Washington. It is generally held in such cases that the wife's right exists even though the husband's fault is not such as to constitute a ground for divorce. *Winburn v. Winburn*, — Ky. —, 124 S. W. 364; *Herrett v. Herrett*, — Wash. —, 111 Pac. 867; contra, *Shores v. Shores*, 133 Ia. 22, 110 N. W. 16.